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June 8, 2018

ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte*, ET Docket No. 18-21, RM-11795

Dear Ms. Dortch:

This is to inform you that on June 6, 2018, representatives of the mmWave Coalition (the "Coalition") met with Chief Engineer Julius Knapp and other personnel of the Office of Engineering and Technology in reference to the above-captioned proceeding concerning making the spectrum above 95 GHz more readily accessible for new innovative services and technologies. The complete list of the meeting participants is included at the end of this letter.

The Coalition representatives summarized the arguments made by the Coalition in its Comments and Reply Comments in the above-captioned proceeding. Specifically, the Coalition representatives reiterated the following points made in its prior filings:

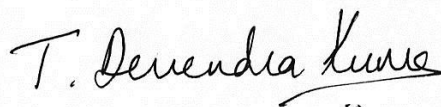
- The Commission should consider developing rules that would accommodate both point-to-point and point-to-multipoint systems, and should explore other options, such as allowing licensees to register operations in an area around a fixed location instead of requiring registration of individual links as required by the existing 70/80/90 GHz rules.
- The Commission should facilitate fixed operations in a large contiguous block of spectrum (on the order of a tens of GHz or more blocks), and should use this proceeding to establish criteria that would protect vital incumbent and future passive users of the spectrum while allowing responsible spectrum sharing. The

rules proposed in the NPRM — with the maximum authorized bandwidth for licensed services is 7.5 GHz and several bands have maximum bandwidths of well under 1 GHz — fail to take full advantage of the almost 200 GHz of spectrum between 95 GHz and 275 GHz and, indeed, do not provide significant incentive for fixed wireless deployments when comparable maximum bandwidth blocks are available at lower frequencies.

- The Commission should make clear that the usual approach of “first-in-time” rights to the spectrum by fixed services will not preclude later use of the above-95 GHz spectrum for mobile operations under appropriate service rules for responsible sharing among all existing allocations.
- The Coalition supports the relaxation of certain requirements in the proposed “Spectrum Horizons Experimental Radio Licenses” rules such as loosening the restrictions on marketing equipment, allowing experimental licenses across the entire 95 GHz-3 THz range, allowing a broad scope for experimental licenses, and the proposed ten-year license term. In addition, the Commission should modify Section 5.83(b) of the rules so that experimental licenses cannot be “subject to cancellation at any time without notice or hearing” without a procedural safeguard to protect experimental licensees who invest significant sums of money in developing technologies under an experimental license.
- The Commission should extend existing RF safety limits, which are currently specified up to 100 GHz, to frequencies above 100 GHz — even if such limits are later modified in a separate proceeding. Not specifying any RF safety limit will lead to regulatory uncertainty during deployments of new above-95 GHz services and technologies, whereas specifying even an interim limit would be better than no limit for the purposes of encouraging investment in and reducing litigation risk for new technologies developed for use in the above-95 GHz spectrum.
- The Commission should establish regulatory certainty for ISM operations (using new technologies such as terahertz spectroscopy) in the above-95 GHz frequencies to encourage capital formation for both developers of new innovative ISM equipment and manufacturers who use such technologies in their manufacturing processes.

Please direct any questions to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, reading "T. Devendra Kumar". The signature is fluid and cursive, with a long horizontal stroke at the end.

Devendra T. Kumar
Counsel to mmWave Coalition

Meeting Attendees for June 6, 2018 mmWave Coalition meeting w/ OET

From OET

Julius Knapp
Ron Repasi
Jamison Prime
Michael Ha
Karen Rackley
Brian Butler
Bahman Badipour
Rodney Small
Nicholas Oros

From mmWave Coalition

Jim Gigrich, Keysight Technologies
Jeffrey Marks, Nokia
Prakash Moorut, Nokia
Jeremy Tole, Azbil North America Research & Development
Anirban Bandyopadhyay, Globalfoundries
Bror Peterson, Qorvo
Michael J. Marcus, Marcus Spectrum Solutions LLC
Henry Goldberg, Goldberg, Godles, Wiener & Wright LLP
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